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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

IN RE:	§	
	§	
HERNAN MIRANDA and	§	
MARIA ALFARO-MIRANDA	§	No. 17-20023-rlj7
	§	
Debtors.	§	
	§	

AMARILLO MEDICAL SPECIALISTS, §	§	
LLP	§	
	§	
Plaintiff,	§	
	§	
v.	§	Adversary No. 02003-rlj
	§	
HERNAN MIRANDA and	§	
MARIA ALFARO-MIRANDA	§	
	§	
Defendants.	§	

**ANSWER TO FIRST AMENDED COMPLAINT FOR
DETERMINATION OF DISCHARGEABILITY**

Defendants Hernan Miranda, M.D. (“Dr. Miranda”) and Maria Alfaro Miranda (collectively referred herein as the “Defendants”), through their counsel of record, hereby answer Amarillo Medical Specialists, LLP’s First Amended Complaint for Determination of Dischargeability (the “Complaint”) and state as follows:

I. PARTIES AND JURISDICTION

1. Defendants admit the allegations in Paragraph 1 of the Complaint.
2. Defendants deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2 of the Complaint.
3. Paragraph 3 of the Complaint contains a legal conclusion to which no response is required.
4. Paragraph 4 of the Complaint contains a legal conclusion to which no response is required.

II. BACKGROUND

5. Defendants admit the allegations in Paragraph 5 of the Complaint.
6. Defendants deny the allegations in Paragraph 6 of the Complaint, except admit Dr. Miranda was a former partner of AMS.
7. Defendants deny the allegations in Paragraph 7 of the Complaint.
8. Defendants deny the allegations in Paragraph 8 of the Complaint, except admit Dr. Miranda entered into a contract with AMS regarding access to his patient records.
9. Defendants deny the allegations in Paragraph 9 of the Complaint.

III. COUNT I- 11 U.S.C. § 523(A)(6) WILLFUL OR MALICIOUS INJURY, CONVERSION

10. Paragraph 10 of the Complaint contains a legal conclusion to which no response is required.
11. Paragraph 11 of the Complaint contains a legal conclusion to which no response is required.
12. Paragraph 12 of the Complaint contains a legal conclusion to which no response is required.

IV. COUNT II- 11 U.S.C. § 523(A)(2)(A)- FALSE PRETENSES

13. Paragraph 13 of the Complaint contains a legal conclusion to which no response is required.

14. Paragraph 14 of the Complaint contains a legal conclusion to which no response is required.

15. Paragraph 15 of the Complaint contains a legal conclusion to which no response is required.

16. Paragraph 16 of the Complaint contains a legal conclusion to which no response is required.

V. COUNT II- 11 U.S.C. § 523(A)(4)- FRAUD & EMBEZZLEMENT

17. Paragraph 17 of the Complaint contains a legal conclusion to which no response is required.

18. Paragraph 18 of the Complaint contains a legal conclusion to which no response is required.

Date: March 30, 2017

Respectfully submitted,

DLA PIPER LLP (US)

By: /s/ Vincent P. Slusher

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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of March, 2017 a true and correct copy of the foregoing document has been served on all appropriate parties by ECF and upon counsel of record for debtors and upon debtors by email and/or regular U.S. Mail at the addresses listed below:

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